

CLERK, U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Paul Bishop

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

1. US Department of Agriculture  
2. The Merit System Protection  
Board

**COMPLAINT**

Jury Trial: ☒ Yes ☐ No  
(check one)

17-3372(BRM/DEA)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	<u>Paul Bishop</u>
	Street Address	<u>22 Sunny side Lane</u>
	County, City	<u>Hillsborough, NJ Somerset Co.</u>
	State & Zip Code	<u>WJ 08844</u>
	Telephone Number	<u>908-359-7049</u>

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name US Department of Agriculture  
 Street Address 1400 Independence Ave SW  
 County, City Washington D.C.  
 State & Zip Code 20250

Defendant No. 2

Name Merit System Protection Board  
 Street Address 1615 M Street NW  
 County, City Washington DC 20419  
 State & Zip Code 20419

Defendant No. 3

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal Questions ☐ Diversity of Citizenship  
☐ U.S. Government Plaintiff ☒ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship \_\_\_\_\_

Defendant(s) state(s) of citizenship \_\_\_\_\_

### III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? See attached  
EEO complaint.

B. What date and approximate time did the events giving rise to your claim(s) occur? See attached  
EEO complaint. The Merit System  
protection Board heard the complaint on July 12, 2016.

C. Facts: See attached EEO Complaint

The Plaintiff appealed his attached  
EE Complaint to the Merit System  
Protection Board on July 12, 2016.

What  
happened  
to you?

Who did  
what?

See attached EEO complaint.  
The Merit System protection  
Board heard the Plaintiff attached  
EEO complain via a hearing, MSPB PH-1221-15-  
0535-W-1 and failed to enforce the  
Plaintiff's Civil Rights.

Was  
anyone  
else  
involved?

Who else  
saw what  
happened?

The Merit System protection Board. The  
Board failed to enforce the Plaintiff's  
Civil rights.

**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

The plaintiff has been black list from employment by the defendant. The injuries sustained are the loss of salary and career advancement opportunity.

**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I request the Court grant the plaintiff all relief as may be appropriate for all damages and cost resulting from the loss of salary and opportunity for advancement as a result of the defendant's actions. These monetary cost are cumulative and on going.

I also request the Court review and reverse the ruling of the Merit System Protection Board of my EEO complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 10 day of may, 20 17.

Signature of Plaintiff Paul Bishop  
Mailing Address 22 Sunny side  
Lane, Hillsborough  
NJ 08844  
Telephone Number 908-359-7049  
Fax Number (if you have one) \_\_\_\_\_  
E-mail Address \_\_\_\_\_

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: Paul Bishop